

1 CHRISTOPHER R. ORAM, ESQ
2 Nevada Bar No. 004349
3 520 South Fourth Street, Second Floor
4 Las Vegas, Nevada 89101
5 (702) 384-5563
6 E-Mail: contact@christopheroramlaw.com

7 Attorney for Defendant
8 EVERLY JAMES

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 * * * * *

13 UNITED STATES OF AMERICA,
14 Plaintiff,

15 vs.

16 EVERLY JAMES

17 Defendants.

18 CASE NO. 2:17-cr-00180-JAD-PAL

19
20 **STIPULATION TO CONTINUE THE**
REPLY TO THE GOVERNMENT'S
RESPONSE (ECF No. 278) TO
DEFENDANT'S MOTION TO DISMISS
(ECF No. 267)(First Request)

21
22
23 IT IS HEREBY STIPULATED AND AGREED, by and between the United States of
24 America, by and through Cristina D. Silva, Assistant United States Attorney, and Everly James,
25 by and through his attorney, Christopher R. Oram, that the Reply to the Government's Response
to Defendant's Motion to Dismiss, currently due on Wednesday, February 28, 2018, be
continued for two (2) weeks, until March 14, 2018, for the following reasons:

26
27
28 1. Counsel for the Defendant requires additional time to draft a Reply to the
Government's Response and to discuss the Government's Response and the Reply with the
Defendant.
2. The defendant is in custody and does not object to this stipulation.
3. Denial of this request could result in a miscarriage of justice because it prevents
counsel for the Defendant from having meaningful discussions with the Defendant concerning
the Reply.

CHRISTOPHER R. ORAM, LTD.
520 SOUTH 4TH STREET | SECOND FLOOR
LAS VEGAS, NEVADA 89101
TEL. 702.384.5563 | FAX. 702.974.0623

1 4. This is the first request to continue the Reply to the Government's Response to
2 Defendant's Motion to Dismiss.

3 /s/ Cristina D. Silva 02/26/2018

4 CRISTINA SILVA DATE

5 Assistant United States Attorney

6 /s/ Christopher R. Oram 02/26/2018

7 CHRISTOPHER R. ORAM DATE

8 Counsel for Defendant E. James

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CHRISTOPHER R. ORAM, LTD.
520 SOUTH 4TH STREET | SECOND FLOOR
LAS VEGAS, NEVADA 89101
TEL. 702.384.5563 | FAX. 702.974.0623

Based upon the pending Stipulation of the parties, and good cause appearing therefore, the Court finds that:

1. Counsel for the Defendant requires additional time to draft a Reply to the Government's Response and to discuss the Government's Response and the Reply with the Defendant.

2. The defendant is in custody and does not object to this stipulation.

3. Denial of this request could result in a miscarriage of justice because it prevents counsel for the Defendant from having meaningful discussions with the Defendant concerning the Reply.

4. This is the first request to continue the Reply to the Government's Response to Defendant's Motion to Dismiss.

For all of the above-stated reasons, the end of justice would best be served by a two week continuance of the deadline for the Defendant to file his Reply to the Government's Response to Defendant's Motion to Dismiss.

ORDER

IT IS ORDERED that the Defendant's deadline to respond to the Government's Response to Defendant's Motion to Dismiss, currently scheduled for February 28, 2018, be vacated and continued to **March 14**, 2018.

DATED this 2nd day of March, 2018.

Peggy A. Leen
THE HONORABLE PEGGY A. LEEN
United States Magistrate Judge